

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Radiac Abrasives, Inc.
1015 South College Avenue
Salem, Illinois 62881

ATTENTION:

Kerry Christofanelli
President and CEO
Radiac Abrasives, Inc.

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Radiac Abrasives, Inc. (Radiac or you) to submit certain information about your facility in Salem, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Radiac owns and operates an emission source at the Salem, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Illinois State Implementation Plan and the health standards established in the Clean Air Act.

Radiac must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Radiac must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

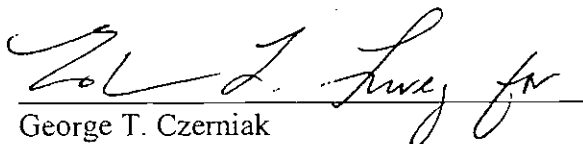
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Radiac to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Kushal Som at (312) 353-5792.

8/14/13
Date


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, provide the name, title, and employer of the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information Radiac is Required to Submit to EPA

Pursuant to Section 114(a) of the Clean Air Act (Act), 42 U.S.C. § 7414(a), Radiac Abrasives, Inc. (Radiac) must submit the following information for its facility located in Salem, Illinois, in accordance with the below specified instructions and schedules:

Naphthalene Monitor and Siting

1. Radiac must install, operate, and maintain an ambient monitoring station containing a polycyclic aromatic hydrocarbon (PAH) sampler. The station must be located at the Salem facility, east of the building, on or near the large square parking lot bounded by the four corners noted below (latitude, longitude):
 - a. Northwest - 38° 37' 8.81" N, 88° 57' 4.29" W
 - b. Northeast - 38° 37' 8.81" N, 88° 57' 2.56" W
 - c. Southeast - 38° 37' 7.63" N, 88° 57' 2.56" W
 - d. Southwest - 38° 37' 7.63" N, 88° 57' 4.31" W
2. The monitoring station and monitoring equipment must be installed, operated, calibrated, and maintained within **60 days** after you receive this request and must conform with the following:
 - a. An air sampler design that meets the requirements of Compendium Method TO-13A, Determination of Polycyclic Aromatic Hydrocarbons (PAHs) in Ambient Air Using Gas Chromatography/Mass Spectrometry (GC/MS) (EPA/625/R-96/010b) (<http://www.epa.gov/ttnamti1/files/ambient/airtox/to-13arr.pdf>);
 - b. Radiac must follow all monitoring siting and quality assurance criteria in 40 C.F.R. Part 58, Appendix E;
 - c. Radiac must collect PAH samples on the standard 1-in-3 day schedule, as posted on EPA's website (<http://epa.gov/ttn/amtic/calendar.html>);
 - d. Radiac must contract with a laboratory for naphthalene sample analysis at a minimum detection limit of ≤ 0.029 micrograms per cubic meter. Radiac must also speciate samples for other routine PAH compounds: acenaphthene, anthracene, benzo(a)pyrene, fluoranthene, fluorene, phenanthrene, and pyrene.
3. Radiac must follow the operating procedures identified in the "Quality Assurance Handbook for Air Pollution Measurement Systems" (<http://www.epa.gov/ttn/amtic/qabook.html>); 40 C.F.R. Part 58, Appendix A; and any

specified procedures in the manufacturer's maintenance manual for the unit used to monitor PAHs.

4. Radiac shall be responsible for all maintenance associated with the PAH monitor. Maintenance must include, at a minimum, the replacement of any equipment and cleaning on a schedule specified in the manufacturer's maintenance manual. Radiac shall be responsible for ordering and paying for any necessary replacement parts, accessories, maintenance, etc.
5. Monitoring must take place for at least one year from the date of installation.

Wind Speed and Direction Monitoring

6. Radiac must install, operate and maintain a meteorological tower within 60 days after it receives this request at a location representative of local wind conditions. At a minimum, the meteorological tower must continuously measure and record wind speed and wind direction at one-hour intervals throughout the entire ambient monitoring period. Reports and records must be maintained and/or submitted in accordance with the paragraphs below.
7. The meteorological monitoring station must follow the Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) (http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV_Meteorological_Measurements.pdf).
8. Radiac shall be responsible for maintenance associated with the meteorological tower on a schedule specified in the manufacturer's maintenance manual. Radiac shall be responsible for ordering and paying for any necessary replacement parts, accessories, maintenance, etc.

General Monitoring Requirements

9. Within 14 days of EPA's approval of the monitoring sites, Radiac must submit a Quality Assurance Project Plan (QAPP) to EPA. The guidance document for writing a QAPP is "EPA Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/600/R-02/009 - December 2002 (<http://www.epa.gov/QUALITY/qs-docs/g5-final.pdf>). Any measures identified by this information request should be incorporated into the QAPP.
10. Radiac must provide personnel from EPA and Illinois Environmental Protection Agency (IEPA) with access to the monitoring site locations and respond to any inquiries from such personnel regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, Radiac must take appropriate corrective actions. Any changes made to monitor siting, operations, or maintenance must be approved by the EPA prior to the change.

11. Radiac must keep a daily log and monthly reports of the following information:
 - a. monitoring data, to be submitted to EPA as provided below ;
 - b. any monitoring system downtime (date, time, duration, and reason) along with any corrective actions taken;
 - c. meteorological measurements, including at least temperature, wind direction, rain/snowfall, and atmospheric pressure, for each day that samples are taken and the source of the meteorological measurements.
12. Data from each monitor and wind monitoring station must be downloaded as **ASCII comma-delimited files** and provided to EPA on CD every month. The files should have a single "header" row, with all following rows being individual records, and all columns being a single variable according to the header row.
13. Monthly reports must be submitted within 14 days of the end of each month to EPA for a period of one year. Radiac must submit these monthly reports to the following individual:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

and, via email to: som.kushal@epa.gov
14. Each monthly report shall contain the following information:
 - a. The emissions of naphthalene, total PAH, and total hazardous air pollutants (HAP) each calendar day of the calendar month from each emission unit identified in response to Paragraph 15.a below;
 - b. The charge rate, feed rate, usage rate, or any other production data utilized to make emission calculations in response to Paragraph 14.a. above;
 - c. The hours of operation each calendar day of the calendar month of each emission unit identified in response to Paragraph 15.a below;
 - d. The total analytical results, monitoring data, and logs identified in Paragraph 11 above.

Additional Information

Please provide the following information within 30 days after you receive this request:

15. A list of all emission units at the Salem facility that:
 - a. ever emit naphthalene, any PAH, and/or any HAP in amounts greater than or equal to 0.1 tons over any 12-month period;

- b. emit naphthalene, any PAH, and/or any HAP in amounts less than 0.1 tons over each 12-month period. For all emission units meeting this criteria, please provide supporting calculations and documentation that support this conclusion.
16. The emissions of naphthalene, total PAHs, and total HAP from each emission unit listed in response to Paragraph 15.a each month since January 2008, in pounds per month; Provide all supporting calculations, assumptions, emission factors, and estimated control efficiencies utilized to make these calculations.
17. The hours of operation of each emission unit listed in response to Paragraph 15.a each month since January 2008.
18. A list of each HAP emitted from each emission unit listed in response to Paragraph 15.a along with supporting documentation.
19. The final report and total results of each stack test, emission characterization, performance test, engineering study, or any other evaluation involving analytical measurements of air pollutants from any emission unit at the facility since January 1, 2008, whether or not IEPA or EPA were notified prior, during, or after the test. You may exclude any test reports previously submitted to EPA in response to an Information Request under Section 114 of the Act or in response to an Administrative Order under Section 113(d) of the Act, so long as the date of such submittal is provided in lieu of the test report.
20. A brief description of any changes, relocations or additions of each oven and kiln since January 1, 2006; an overhead map showing locations (with corresponding UTM coordinates) of each oven and kiln that operated on January 1, 2006; and a second overhead map showing locations (with corresponding UTM coordinates) of each oven and kiln which is operating currently.
21. Provide a brief description of how naphthalene is utilized at your facility (*i.e.*, from its storage to its destruction or release into the environment). For all bonded-abrasives products manufactured at the Salem facility within last calendar year, identify each product category in which naphthalene is used. Identify each oven and kiln in which each such product category was processed.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between

disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information."

CERTIFICATE OF MAILING

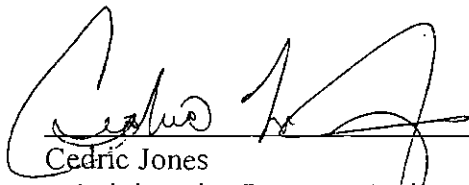
I, Cedric Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by UPS Overnight, signature required, to:

Kerry Christofanelli
President and CEO
Radiac Abrasives, Inc.
1015 South College Avenue
Salem, Illinois 62881

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Ray Pilapil, Manager
Bureau of Air, Compliance and Enforcement Section
Illinois Environmental Protection Agency
P.O. Box 19506
Springfield, IL 62794

On the 16th day of AUGUST 2013.


Cedric Jones
Administrative Program Assistant
AECAB, Planning and Administration Section

UPS TRACKING NUMBER

12 A49 E01 01 9641 6922

Standard bcc's: Official File Copy w/Attachment (s)
 Originating Organization Reading File w/Attachment(s)

Other bcc's: Kushal Som, AE-17J
 Eaton Weiler, C-14J